Annex 1

Views and Proposals of CSC, Hughes Communications Galaxy, Inc., and Hughes Space Communications Company on the Substantive Modification of RR 2613/S22.2

A. Background

As discussed at CPM-95, the following issues are pertinent under WRC-95 agenda items 1 (VGE) and 4 (consequential changes):

- There is no clear means in §I of Article 11 or Appendix 4 for considering the capability of a network to comply with No. 2613.

- No. 2613 and the registration procedures of Article 13 do not address the possibility that by demanding an unreasonable level of protection from interference, one non-GSO network could effectively accrue exclusive use of all unregistered GSO orbit and spectrum resources, thereby preventing accommodation of future GSO FSS networks.

The large number of advance publications for non-GSO FSS networks below 30 GHz made since WARC-92 was considered to give impetus to resolution of the above issues. Frequency assignments for many of these proposed networks can be notified prior to WRC-95, which raises the potential issue of retroactive application of modification to No. 2613 and associated provisions. IWG-1 was unable to fully address the latter issue; instead, attention was

focused on preventing the occurrence of the underlying problems with respect to future non-GSO networks. To facilitate the analysis and formulation of mitigating proposals, the issues were addressed separately in two frequency ranges:

- Bands below 17.7 GHz, where co-directional sharing between GSO and non-GSO networks has been shown to be impractical except where non-GSO networks comply with the provisions of No. 2613.

- Bands above 17.7 GHz, where co-directional sharing between GSO and non-GSO networks may be feasible with certain constraints.

The possibility of applying a coordination procedure with its associated sharing constraints in either or both frequency ranges (outside bands designated for non-GSO MSS feeder link use) was assessed as a potential means for invoking sharing between non-GSO and GSO FSS networks. Given that technical studies show such sharing to be impossible below 17.7 GHz without sharing constraints similar to No. 2613, coordination absent an effective No. 2613 cannot eliminate the problem of non-GSO networks laying perpetual claim to all currently unregistered GSO orbit and spectrum resources. Indeed, this issue is analogous to the issues in the ITU and COPUOS of dwindling GSO spectrum and orbit resources for GSO networks (see Resolution No. 18 (previously COM 4/10) of the Kyoto Plenipotentiary Conference. Incorporating

consideration of an effective No. 2613 in the context of sharing (e.g., under No. 1060) would also invite an examination of compliance with No. 2613 by the Bureau. Because of the uncertainties associated with such an examination, the US opposed incorporation of this approach in the Report of CPM95 (see Doc. CPM95/TEMP/11). This position could be revisited in light of the complicated examinations by the Bureau invited under the proposals for consideration of power flux-density levels generated by MSS space stations in the 1 - 3 GHz range (Resolution No. 46). However, coordination outside the bands designated for use by non-GSO MSS feeder link networks would eliminate the streamlined nature of procedures for advance publication and notification now enjoyed by non-GSO networks.

At frequencies below 17.7 GHz, GSO FSS orbit and spectrum resources are either heavily used by GSO networks or allotted for particular GSO FSS uses under *a priori* Plans (Appendix 30B). There are already severe shortfalls in spectrum and orbit resources available for GSO FSS, and so, it simply is not practical to expend those resources on non-GSO networks (the reverse band sharing proposed for non-GSO MSS feeder link networks does not significantly consume GSO orbit and spectrum resources).

At frequencies above 17.7 GHz, GSO FSS orbit and spectrum resources are less affected by co-directional non-GSO networks. Nonetheless, the potential exists for a non-GSO network to

consume all available resources. Thus, in bands above 17.7 GHz, it is essential that a modification to No. 2613 be considered in order to render the provision effective. IWG-1 was unanimous in recognizing that there currently is no problem above 30 GHz, where neither GSO nor non-GSO networks have been significantly developed. However, there was some disagreement regarding the treatment of No. 2613 at bands between 17.7 GHz and 30 GHz.

B. Proposals

1. Proposals Formulated by GSO Advocates

a. Modifications to No. 2613 (S 22.2)

S22.2 (a) For networks in the fixed-satellite service in frequency bands below 30.0 GHz where this provision is not waived in Article 8/S__, administrations shall indicate that their non-geostationary space stations and associated earth stations have the capability of ceasing, redirecting or reducing their emissions when necessary in order to ensure that interference to networks using geostationary satellites in accordance with these Regulations is at or below permissible levels.

S22.2 (b) For networks in the fixed-satellite service in frequency bands below 30.0 GHz where this provision is not waived in Article 8/S__, space stations and

associated earth stations of networks using non-geostationary satellites shall cease, redirect or reduce emissions when necessary to prevent harmful interference with respect to networks using geostationary satellites in accordance with the provisions of these Regulations.

b. Modifications to Appendix 4/S__

ADD the following provision to Appendix 4/S__:

Section E.Overall link characteristics

ADD E.3 Criteria for frequency sharing between networks using non-geostationary space stations (except for feeder links associated with MSS service links in the 1-3 GHz range) and networks using geostationary space stations

For networks using non-geostationary space stations, Include a description of the capability of the network to meet No. 2613 (MOD)/S22.2, where applicable. For geostationary networks, indicate the proposed levels of accepted interference with respect to any non-geostationary network.[2]

[2] Levels of accepted interference require further ITU-R study for incorporation into the RR. Prior to such incorporation, the consultative provisions of Article 11 (S9), Section 1 will be applied to achieve interim agreement with the

objective that initial systems implementations will not bar indefinitely the entry of subsequent systems.

ANNEX 2

ANNEX 2

Views and Proposals of Teledesic Corporation on the Application of RR 2613/S22.2

"Modification of RR2613 - Regulatory/Procedural Changes Needed to Accommodate Non-GSO Satellite Networks"

A. Introduction

The IWG-1 Report correctly states that the issue of modifying the language and/or the application of RR2613 is "applicable to all NGSO systems that currently operate or may operate in the bands used by the GSO FSS systems." This RR2613 issue is symptomatic of the general problem of the accommodation of both GSO and non-GSO satellite systems on an equitable basis in frequency bands allocated to the FSS, which bands may also be required to provide for non-GSO MSS feeder links.

The regulatory structure governing satellite communications has evolved to fit the characteristics of geostationary satellites. That regulatory structure served well until the emergence of non-GSO systems, whereupon an essentially ad hoc approach was attempted to handle what were viewed as a very limited number of special cases. But with a variety of non-GSO systems proposed, the ad hoc approach becomes something less than optimal. The GSO and non-GSO satellite systems have fundamentally different system characteristics which need to be accommodated through different regulatory structures. The regulatory approach to frequency sharing (orbital arc separation) that has been applied to GSO systems, no longer has meaning when applied to non-GSO systems

whose space systems are in constant motion relative to the Earth and to other space systems.

The general incompatibility of the methods by which GSO and non-GSO systems share the same frequencies has resulted in RR2613 which requires that non-GSO systems cease transmitting whenever they would interfere with a GSO satellite. No similar restriction is placed on GSO satellites in the case of interference to a non-GSO system. RR2613 subjects non-GSO systems to unbounded regulatory uncertainty, as their operation would be vulnerable to pre-emption by any and all GSO satellites, even those deployed long after the non-GSO system.

There is general recognition that both the GSO satellite networks and non-GSO satellite networks must have a regulatory base which permits their orderly operation without unreasonable regulatory uncertainties to their full operational life. Attempting to accommodate GSO systems and non-GSO systems in the same frequencies is highly problematic, and even more so when the systems involve large numbers of small terminals. Any attempt to modify the existing order to accommodate GSO and non-GSO systems in the same way in all bands inevitably will be unsatisfactory to all concerned. The solution is to leave the existing GSO order in place for bands where GSO systems enjoy primary status and to allocate separate bands where non-GSO systems would be primary. In the already congested bands, this would be difficult, but in the Ka band, where systems of both types are just now coming into use, this separation of incompatible systems could be accomplished.

Within WRC-95 agenda item 2.1 c) to "consider allocations and regulatory aspects for feeder links for the mobile-satellite services" while at the same time "recognizing further ... the need to maintain and protect other services to which the frequency bands to be considered by WRC-95 are also allocated", there is the opportunity to provide for MSS feeder

links, to accommodate other NGSO systems that plan to use the bands, and to strengthen the position of the GSO systems by providing frequency band separation between the non-GSO and the GSO satellite systems.

B. Regulatory/Procedural Approach to Modification of RR2613 as Applied in the Bands Between 17.7 - 30.0 GHz

Some of the allocations to the Fixed-Satellite Service could be qualified in a manner which would accommodate non-GSO systems including MSS feeder link networks. Specifically in the bands between 17.7 - 30.0 GHz and in particular sub-bands identified for use primarily by non-GSO networks including MSS feeder link networks, future access by non-GSO satellite systems would be guaranteed by 1) waiving RR2613, 2) providing existing GSO networks equal status with respect to non-GSO networks, and 3) requiring future GSO networks to not cause harmful interference to, or receive protection from, non-GSO networks.

C. Proposals Regarding Non-GSO Satellite Systems Including Feeder Links for Mobile-Satellite Service Networks (Limited Application of RR2613)

To specifically accommodate the feeder links for the non-GSO MSS, and with due regard to existing services (both non-GSO networks and GSO networks) to which the frequency spectrum is also allocated, two simple and practical proposals are offered. These proposals: 1) provide sufficient spectrum in the Ka band in each direction to accommodate the three non-GSO systems currently proposed to use the Ka band, and 2) give "due regard to existing services" by providing the regulatory opportunity for both non-GSO and GSO networks to be implemented in different parts of the band (in these sub-band RR2613 is waived but not otherwise modified). See Addendum to IAC Report, "Feeder Links for MSS Networks with Service Links Outside the Range 1 - 3 GHz" (discussing two proposals for Ka-Band allocations).

D. Alternative Proposals

Modifications to Article 8 which would only accommodate non-GSO MSS feeder links would only address part of the real problem. Providing for the feeder links without accommodating the other uses of the band, such as non-GSO systems and GSO FSS systems would not be fully responsive to the WRC agenda directives.

Solutions that divide the band use only between non-GSO MSS feeder links and GSO FSS systems would improperly ignore another legitimate user of the band, the non-GSO FSS systems. If additionally there were a further strengthening of RR2613 in bands not used by non-GSO MSS feeder links, that would add to the imbalance that already exists against non-GSO systems.

The solution of merely waiving RR2613 in certain bands and then relying on coordination procedures to allow the entry of both non-GSO and GSO systems would preclude Teledesic and other non-GSO satellite systems from implementing their systems because of the random deployment of the large number of GSO systems already notified and under coordination.

SECTION V
IWG-1 COMMENTS WITH REGARD TO REVISION OF APPENDICES 30 AND 30A UNDER WRC-95 AGENDA ITEMS 1 AND 3A

SECTION V

IWG-1 COMMENTS WITH REGARD TO REVISION OF APPENDICES 30 AND 30A UNDER WRC-95 AGENDA ITEMS 1 AND 3A

A. Introduction

The WRC-95 agenda contains two items pertaining to Appendices 30 and 30A. Both could impact upon implementation of broadcasting-satellite systems under the Region 2 BSS and feeder link Plans developed at RARC-83 and incorporated respectively into Appendices 30 (Orb 85) and 30A (Orb 85) of the Radio Regulations.

Under item 1, WRC-95 must consider the Report of the VGE which, inter alia, contains three recommendations that would lead to major changes in how the Region 2 Plans are presented in the Radio Regulations. Besides removing the Plans themselves from the Regulations, these recommendations would replace the procedures for Plan implementation by new "simplified procedures" applicable to all space services and would substitute a new "generic" modification procedure for the existing modification procedures in Appendices 30 and 30A. The details of these changes are elaborated in Section 2 below.

Under item 3a, WRC-95 would decide how to revise the BSS and feeder link Plans for Regions 1 and 3 in response to Resolution 524 of WARC-92. Although the existing assignments in the Region 2 Plans would presumably not be affected, specific system designs incorporating current technology very likely would be. The objectives to be considered in the revision of Appendices 30 and 30A for Regions 1 and 3 are described in Section 3.

B. ISSUES UNDER WRC-95 AGENDA ITEM 1

Under agenda item 1, WRC-95 must consider three Recommendations (Rec. Nos. 2/3, 2/5, and 2/6) which, though not intended to alter the substance of the Appendices, would dramatically change their format and contents. Generally, the United States is supportive of the objectives of the VGE Recommendations and recognizes the considerable

effort that went into demonstrating how they could be applied in practice. However, based on a careful examination of these Recommendations, there are questions regarding the desirability of adopting them, at least during WRC-95, for the following reasons:

- The changes would eliminate the Plans for BSS and their feeder links from the Radio Regulations and disperse related provisions and procedures to different parts of the Radio Regulations. It is not obvious that this arrangement is as simple or useful as maintaining all of the relevant material in a single appendix unless the same set of procedures could serve several plans.

- Of the five independent sets of Plans in the Radio Regulations (in Appendices 25, 26, 27, 30/30A, and 30B), however, the VGE Recommendations would affect only two (25 and 30/30A). Of these, it is understood that there is substantial opposition from the users of the Appendix 25 Plan. If this opposition is sustained by WRC-95, the VGE Recommendations would affect only the BSS/feeder link plans.

- Even if there were compelling advantages to applying the VGE Recommendations only to Appendices 30 and 30A, it would appear premature to do so at WRC-95 since this conference will be considering major revisions to the Plans and associated procedures of Appendices 30 and 30A under agenda item 3a. The simplified procedures might better be used as a model for consideration in the revision of the Appendices at WRC-97.

In addition to the foregoing, there are a number of consequential changes proposed for Appendices 30 and 30A and listed in detail in Annex 3 to Part A of the VGE Report (pp. 72-78). These include suppression of Articles 1, 4, 5, 6, 7, 8, 9, 10, 11, and 13 of Appendix 30 and Articles 1, 4, 5, 6, 7, 8, 9, 9A, and 11 of Appendix 30A.

Articles 10 and 11 of Appendix 30 are the BSS Plans themselves, and Articles 9 and 9A of Appendix 30A are the corresponding feeder link Plans. The VGE has recommended that these detailed descriptions of the assignments be removed from the Radio Regulations altogether on the understanding that they shall be maintained by the Radiocommunication Bureau and published periodically. Most of the other Articles proposed for suppression would be replaced by the "simplified procedures" of new Articles S9, S10,

S11, S13, and S14, although it is recognized that certain provisions of the original Articles are not covered in the simplified procedures. Special means would be found to accommodate these omissions if it were decided by WRC-95 (or WRC-97) to use Article S10 for Plan modification and S11 for notification and recording of frequency assignments.

The VGE also provisionally recommends (in Annex 5 to Part A) suppression of the procedures of Resolution 33 which are intended for use in implementing BSS systems in bands not subject to the Plans of Appendices 30 and 30A. In addition, they would insert references to the "simplified procedures" in the "Interim System Procedures of Resolution 42" which were applied by the U.S. in notifying the DIRECTV system to the Radiocommunications Bureau. As with the changes proposed by the VGE for Appendices 30 and 30A, above actions proposed for Resolution 33 would sacrifice procedures carefully specialized to the needs of the BSS with no gain in simplification. Likewise, the editorial amendments proposed for Resolution 42 would do nothing to enhance its proven utility.

C. ISSUES UNDER WRC-95 AGENDA ITEM 3A

Agenda item 3a calls for a consideration of Appendices 30 and 30A for Regions 1 and 3 in response to WARC-92 Resolution No. 524, with a view to WARC-97 taking appropriate action. Under this item, WRC-95 is to consider how to revise the parts of Appendices 30 and 30A applicable to Regions 1 and 3 with the following objectives as specified in resolves 1 and 2 of Res. 524:

- maintain each country's assigned BSS capacity in the Plan, as a minimum
- provide for the needs of new countries
- protect notified systems that are in conformity with Appendices 30 and 30A
- take account, as far as possible, of systems which have been communicated to the IFRB under Article 4 [the modification procedure of Appendices 30 and 30A]

- o ensure that the integrity of the Region 2 Plans and their associated provisions are preserved.

Preserving the integrity of the Region 2 Plan in the course of the revision of Appendices 30 and 30A is of paramount interest to the USA. There is concern that the conditions for protecting the integrity of the Region 2 Plan cited in Resolves 2 of Resolution 524 may not be sufficient to protect Region 2 systems implemented under the "interim system" procedures of Resolution 42 of the Radio Regulations.

In assessing the impact of revising the Regions 1 and 3 Plans and the associated inter-Regional sharing criteria, it is critical to take into account that BSS systems implemented in Region 2 differ in important ways from those described in the Region 2 Plan.[1/] These differences make current, and probably future, BSS systems in Region 2 significantly more vulnerable to interference from BSS and FSS systems in Regions 1 and 3 than the existing Region 2 plan assignments would be. Until and unless permanent modifications are made to the Region 2 Plan under Article 4 of Appendices 30 and 30A, Regions 1 and 3 would not be obligated to provide the inter-Regional interference protection that Region 2 BSS systems require. Thus, any examination of the impact on Region 2 of the proposed revisions to the Regions 1 and 3 Plans and sharing criteria should be based on the assumption that the Region 2 assignments in the Plan have been permanently modified to reflect the characteristics of the systems actually launched or under construction. It is also critical to recognize that the U.S. has assignments in the Region 3 Plan for its Pacific Territories and that certain Region 1 Administrations (France, U.K., Netherlands for example) have territories well within Region 2 that have assignments in the Region 1 Plan.

1/ With the implemented systems, service areas are larger, satellite eirps are lower, earth station receiving antennas are smaller, receiver noise temperatures are lower, and modulation is digital rather than analog.

In connection with Inter-Regional sharing criteria, consideration needs to be given as to whether or not these criteria might be modified on a reciprocal basis with Region 2. Subject to the examination of concrete proposals, it is believed that such reciprocity would be desirable and should be pursued actively.

Finally, agenda item 3a requires that consideration be given to the implications for Region 2 countries of taking into account the orbital arcs of Appendix 30B when revising the Regions 1 and 3 Plans. The preliminary view of IWG-1 is that, subject to appropriate inter-Regional sharing criteria, the impact on Region 2 would be negligible and would lead to mutually desirable improvements in the practical usefulness of the revised Regions 1 and 3 Plan.

D. SUMMARY AND CONCLUSIONS

Noting the foregoing discussion, the following points are recapped:

(a) Decisions at WRC-95 affecting Appendices 30 and 30A are called for under both agenda items 1 and 3a. Under agenda item 1, WRC-95 must consider three Recommendations (Rec. Nos. 2/3, 2/5, and 2/6) which, though not intended to alter the substance of the Appendices would dramatically change their format and contents.

(b) General objectives of the VGE Recommendations should be supported by the U.S. and recognition should be accorded to the scale of effort that went to their preparation.

(c) However, as regards Appendices 30 and 30A, an examination of the aforementioned Recommendations indicates their adaption should be questioned for the following reasons:

- The changes would eliminate the Plans for BSS and their feeder links from the Radio Regulations and disperse related provisions and procedures to different parts of the Radio Regulations. It is not obvious that this arrangement is as simple or useful as maintaining all of the relevant material in a single appendix unless the same set of procedures could serve several plans.

- o Of the five independent sets of Plans in the Radio Regulations (in Appendices 25, 26, 27, 30/30A, and 30B), however, the VGE Recommendations would affect only two (25 and 30/30A). Of these, it is understood that there is substantial opposition from the users of the Appendix 25 Plan. If this opposition is sustained by WRC-95, the VGE recommendations would affect only the BSS/feeder link plans.

- o Even if there were compelling advantages to applying the VGE Recommendations only to Appendices 30 and 30A, it would appear premature to do so at WRC-95 since this conference will be considering major revisions to the Plans and associated procedures of Appendices 30 and 30A under agenda item 3a. The simplified procedures might better be used as a model for consideration in the revision of the Appendices at WRC-97.

(d) WRC-95 agenda item 3a calls for a consideration of revisions to Appendices 30 and 30A for Regions 1 and 3 under the terms of WARC-92 Resolution 524. The USA is concerned that the conditions for protecting the integrity of the Region 2 Plan cited in Resolves 2 of Resolution 524 may not be sufficient to protect United States systems implemented under the "interim system" procedures of Resolution 42 of the Radio Regulations.

(e) In assessing the impact of revising the Regions 1 and 3 Plans and the associated inter-Regional sharing criteria, it is critical that the United States take into account that its BSS systems differ in important ways from those described in the Region 2 Plan.

(f) Any examination of the impact on Region 2 of the proposed revisions of the Regions 1 and 3 Plans and their associated inter-regional sharing criteria should be based on the assumption that the United States assignments in the Plan have been permanently modified to reflect the characteristics of the systems actually launched or under construction by United States permittees.

E. RECOMMENDATIONS

In view of the foregoing, IWG-1 recommends that:

1) The United States should oppose adoption at WRC-95 of VGE Recommendations No. 2/3, 2/5, and 2/6 and the other consequential changes flowing from these recommendations. This means no changes to Appendices 30 and 30A and no changes to Resolutions 33 and 42 under WRC-95 agenda item 1.

2) The U.S. should participate actively in considering the options for revising the plans and associated provisions of Appendices 30 and 30A for Regions 1 and 3 under WRC-95 agenda item 3A with the following objectives:

a. to ensure equitable assignments for U.S. territories in Region 3.

b. to protect Region 2 assignments as implemented (or planned for implementation) against interference not only from revised assignments for service areas within Regions 1 and 3, but also from revised assignments to Region 1 countries for service to their territories in Region 2.

3) The U.S. should not oppose the adoption of new inter-Regional sharing criteria or the adoption of new orbital assignments that permit co-location of assignments in the revised BSS Plan with existing allotments in the FSS allotment Plan provided the objective of IWG-1 Recommendation 2b above is met.

APPENDIX A

IWG1: STATUS OF WORKING GROUP'S REVIEW OF VGE RECOMMENDATIONS

REF	QUESTION	DISPOSITION	✓
1.1 (b)	No. 1.1(b) causes the new Radio Regs to be applicable to modification of world plans; at present each world plan contains its own modification procedures which were uniquely developed to suit the particular plan. See Art. S10. USG is opposed to adoption of Art. S10 as part of Radio Regulations, and is proposing to suppress it and make it a resolution, instead.	IWG1 agrees with USG proposal.	✓
1.4	The simplified procedures, starting with No. 1.4, make repeated reference to the new Rules of Procedure (ROP). The Bureau is presently drafting the ROPs. There is concern that ROPs may contain, in addition to procedural rules, provisions which affect the substantive rights of members. Related provisions are CV 168, 169, which require the Bureau to submit draft ROPs for approval by Board and distribute ROPs to all members and collect comments thereon. See also CS 95, which states that the Board shall approve the ROPs; the ROPs must be open for comment by members; and, in case of disagreement regarding ROPs, the matter may be submitted to a forthcoming WRC.	Request USG to seek issuance of draft ROPs ASAP, but no later than six months before WRC-95. If there are substantive concerns with the draft ROPs, USG should request they be added to WRC-95 agenda per CS 95.	✓
1.5	Does the reference to "harmful" interference here refer to calculated or perceived harmful interference? Also, does this provision contravene Article 45 of the Constitution?	IWG1 notes the apparent contradiction between 1.5 and Art. 45 of Const.	✓

REF	QUESTION	DISPOSITION	✓
2.1	Concern was expressed about need to define "plan." Also, the mere fact that an assignment is consistent with a plan does not automatically result in recording in the Master Register. Use of the term "frequency assignment" is not proper in connection with use of a frequency pursuant to a plan.	IWG1 notes the need to modify 2.1 to correct the use of the terms "frequency assignment" and "plan."	✓
2.1.1	This definition of "frequency assignment" is inconsistent with use of the term in the title of Article S8; also inconsistent with use of the term in No. 2.2.	Same as 2.1	✓
2.2	See IWG1 Doc No. 12. (USA/1 MOD: Restore omitted language to give continued protection to Operation A assignments).	No objection to USG proposal.	✓
2.3	See IWG1 Doc No. 12. (USA/2 MOD: Delete the term "associated provisions" and replace with substitute language.) See also VGE Note 2.	Agrees with USG proposal.	✓
2.4	See IWG1 Doc No. 12. (USA/3 MOD: delete reference to "associated provisions" and replace with substitute language.) See also VGE Note 2.	Same as 2.4	✓
3.1	See IWG1 Doc. No. 19 (Comsat contribution). The language of 3.1 is ambiguous as to the timing of the coordination request.		

REF	QUESTION	DISPOSITION	✓
3.2	See IWG1 Doc No. 13. (USA/1 MOD: Provide for bilateral contact between parties involved.) See also IWG1 Doc No. 19 regarding interrelationship between the timing of coordination request and timing of advance information. See also IWG1 Doc No. 13.	IWG1 agrees with USG proposal.	✓
3.2 bis	See IWG1 Doc No. 13. (USA/2 MOD: Re-insert RR 1056 regarding reporting to Bureau on results of advance publication phase.)	No objection to USG proposal.	✓
3.2 ter	See IWG1 Doc No. 13. (USA/3 ADD: Restore time to begin coordination per RR 1058E.) See also IWG1 Doc. No. 19 regarding relationship between 3.2 ter and 3.1.	IWG1 notes the cross-reference relationship between 3.1 and 3.2 ter.	✓
3.4	See IWG1 Doc No. 13. (USA/4 MOD: Clarify that coordination only required with stations of same or higher category of service).	No objection to USG proposal.	✓
3.4 (i)	See IWG1 Doc No. 13. (USA/5: Delete reference to VGE Note 4.)	No objection to USG proposal.	✓
VGE N.4	See IWG1 Doc No. 13 (USA/6 Sup: Delete VGE Note 4.) [NOTE: Seek specific comment from Small LEOs.]	No objection to USG proposal.	✓

REF	QUESTION	DISPOSITION	✓
3.4 bis (ADD)	See IWG1 Doc No. 13. (USA/7 ADD: Add text from Appendix S5). It is noted that the USG proposal and rationale are questioned by IWG1 Doc No. 20.	IWG1 expresses concern about USG proposal, as explained in IWG1 Doc. No. 20.	✓
3.5	The definition of the word "coordination" is an issue. Also, its placement here is inappropriate. Make it a footnote to the Title of Section II (Coordination Procedure).	Change 3.5 to a footnote.	✓
3.9	See IWG1 Doc No. 13. (USA/8 MOD: add "all or part of" to refer to service area.) It was the view of some IWG1 members that the present VGE language is satisfactory and that the USG modification may not be necessary.	No objection to USG proposal.	✓
3.10	See IWG1 Doc No. 13. (USA/9 MOD: Specify the assignments with which coordination must be effected.) See also 3.4 bis.	Same as 3.4 bis.	✓
3.12	See IWG1 Doc No. 13. (USA/11 MOD: Remove requirement to send the coordination request to the identified administrations.)	IWG1 agrees with the USG proposal.	✓
3.12.1	See IWG1 Doc No. 13. (USA/12 MOD: Simplify language regarding providing copies to Bureau, e.g., "...when assistance of the Bureau is sought under Nos. 3.4(k), 3.4(b) or 3.4(m), a copy shall be provided to the Bureau."	IWG1 is concerned about the adequacy of the language change in the USG proposal; prefers alternative form at left.	✓

REF	QUESTION	DISPOSITION	✓
3.12 bis	See IWG1 Doc No. 13. (USA/13 SUP: Remove reference regarding alternative procedure for publishing in Weekly Circular.) NOTE: IWG1 Doc No. 24 (Comsat proposal for modification of 3.12bis regarding identification of administrations to be taken into account in coordination when Resolution 46 applies) is inapplicable in light of change proposed for 3.12; however, if 3.12 is not changed, then 3.12 bis should be changed per IWG1 Doc. No. 24.	IWG1 agrees with the USG proposal, but see NOTE at left.	✓
3.12 bis.2	See IWG1 Doc No. 13 (USA/14 SUP: Delete footnote 3.12 bis.2 as redundant.) Consequential to change in 3.2.	IWG1 agrees with USG proposal.	✓
3.14	Clarification is needed as to who is the "responsible administration." Does it mean the one who is making the coordination request? The language is not clear, and should be made more precise.		
3.15	Some IWG1 members expressed the view that this section may not be necessary.		
3.16 (b)	See IWG1 Doc No. 13. (USA/15 MOD: delete "other" with reference to administrations.)	IWG1 agrees with USG proposal.	
3.16 (d)	See IWG1 Doc No. 13. (USA/16 MOD: add "promptly" to indicate that prompt publication is essential.)	IWG1 agrees with USG proposal.	